

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<hr/>	:	CHAPTER 7
	:	
ALLEN R. CHACHA	:	BANKRUPTCY NO. 24-14219 (PMM)
	:	
Debtor	:	
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**APPLICATION OF ROBERT H. HOLBER, CHAPTER 7
TRUSTEE, TO EMPLOY KARALIS PC AS COUNSEL**

COMES NOW, Robert H. Holber, Chapter 7 Trustee (the “Trustee”) for the estate (the “Estate”) of Allen R. Chacha (the “Debtor”), and respectfully represents as follows:

1. On November 24, 2024, the Debtor filed for protection under Chapter 7 of the Bankruptcy Code.
2. On November 26, 2024, the Trustee was appointed and is so acting.
3. The Trustee has made a careful and diligent inquiry as to the qualifications and competence of Karalis PC (“KPC”) and is advised that KPC, by reason of ability, integrity and professional experience, is capable of providing legal counsel to the Trustee. Said KPC has no interest adverse to the Estate.
4. To the best of the Trustee’s knowledge, KPC has no connection with the Debtor, creditors or any other parties in interest, their respective attorneys or accountants pursuant to Bankruptcy Rule 2014.
5. KPC’s attorneys have represented numerous trustees in a variety of complex matters and are experienced in matters of this type.
6. The Trustee has engaged the services of KPC as her counsel, subject to Court approval.
7. KPC will render all professional services which are allowed to be performed by

counsel to the trustee pursuant to applicable bankruptcy law. The professional services which counsel are to render to the Trustee are as follows:

- (a) Providing legal advice and preparing all legal pleadings necessary for the completion of any settlement pertaining to funds to be recovered by the Trustee;
- (b) Litigating, as necessary, any and all claims asserted on behalf of the Estate;
- (c) Defending, as necessary, any and all litigation asserted against the Estate and negotiating settlements of these claims upon discussion with the Trustee on behalf of the Estate; and
- (d) Advising the Trustee on all legal matters which might arise during the pendency of this proceeding.

8. Specifically, KPC will provide legal services to the Trustee concerning the following:

- a. All legal duties related to compelling the Debtor to turnover property of the Estate and
- b. All legal duties related to the administration of all other assets.

9. The hourly rates presently charged by the firm are as follows: Partners rates range from \$525.00 to \$675.00, of counsel rates are \$575.00, and Associates rates range from \$300.00 to \$325.00 per hour and Paralegal rates are \$180.00 per hour. These rates are subject to periodic adjustments by providing the Office of the United States Trustee and all parties in interest ten (10) business days' notice before implementing any periodic rate increases by filing notice with the Bankruptcy Court.

10. The Trustee contends that KPC's employment is necessary and in the best interest of the Estate.

11. The Trustee has determined that the services of KPC are needed and that the cost is warranted.

WHEREFORE, your Applicant prays for the employment of KPC as counsel to the Trustee at such compensation as the Court allows.

**CHAPTER 7 TRUSTEE FOR THE ESTATE OF
ALLEN R. CHACHA**

/s/ Robert H. Holber

Robert H. Holber

Dated: September 22, 2025